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Attorneys for Plaintiff,
Sonia Feldman

**UNITED STATES DISTRICT
DISTRICT OF NEVADA**

SONIA FELDMAN,

Plaintiff,

v.

MARK ANTHONY SAWYER, ET AL,

Defendants.

Case Number: 2:24-cv-00526-JCM-MDC

**PLAINTIFF SONIA FELDMAN'S
NOTICE OF NON-COMPLIANCE
WITH COURT'S ORDERS (DKT. 36)
AND (DKT. 38)**

Plaintiff Sonia Feldman, by and through her attorneys, respectively submits this notice of Defendants' non-compliance with this Court's Order (Dkt. 36), dated December 20, 2024, and with this Court's Order (Dkt. 38), dated March 7, 2025.

On December 20, 2024, this Court ordered at page 3, paragraphs 3 – 5 (Dkt. 36):

3. Non-corporate defendants (Mark Sawyer and Jennifer Sawyer) shall file either a notice of appearance of new counsel or a notice of intent to proceed pro se on or before **February 20, 2025**. (Bold emphasis in the original.)
4. The corporate defendants (all other defendants) shall file a notice of appearance of new counsel on or before **February 20, 2025**. (Bold emphasis in the original.)
5. Failure to timely comply with this order may result in sanctions, including a recommendation that this case be dismissed.

The defendant entities (i) MJS NEVADA TRUST; (ii) THE PROPERTY LOCATED AT 6508 Setting Moon Street, North Las Vegas, NV 89084-1258; (iii) ATD COMMERCE, LLC; (iv) ACM NORTH, LLC; (v) MAS HOLDINGS GROUP, and (vi) LLC; SAWYER HOLDINGS, LLC were all ordered to file a notice of appearance of new counsel, on or before February 20, 2025, two months after the order issued.

At page 3 of the Order (Dkt 36), these defendant entities were warned:

DEFENDANT ENTITIES MUST RETAIN NEW COUNSEL

Defendants are cautioned that in federal courts, corporate entities may only appear through licensed counsel. *United States v. High Country Broad. Co*, 3 F.3d 1244, 1245 (9th Cir. 1993). Therefore, the corporate defendants must retain counsel and file a notice of appearance by new counsel on or before February 20, 2025. Failure to do so will result in adverse consequences, including sanctions and judgment against such corporate defendants.” Order, page 3, lines 6-11.

The defendant entities were permitted two months to retain new counsel and file a notice of appearance. Approximately five months have passed, and the defendant entities have still not complied with the Court’s Order No. 36.

As this Court advised defendants, “A corporation may appear in federal court only through licensed counsel. *United States v. High Country Broad. Co*, 3 F.3d 1244, 1245 (9th Cir. 1993). In *High Country*, the Ninth Circuit ruled, it “was perfectly appropriate” for the district court to enter a default judgment against a defendant that failed to retain counsel after being

1 ordered to do so. *Id.* Plaintiff requests that this Court do the same as the court in *High Country* and
2 enter a default judgment against each of the corporate defendants.

3 Additionally, the non-corporate defendants, Mark Sawyer and Jennifer Sawyer) were ordered
4 to file either a notice of appearance of new counsel or a notice of intent to proceed pro se on or
5 before **February 20, 2025**. Again, approximately five months have passed since the issuance of
6 the Court's Order 36, and the non-corporate defendants have refused to comply. Plaintiff therefore
7 requests that judgment against the non-corporate defendants be entered as well.

8 Finally, after Plaintiff filed her motion for summary judgment (Dkt. 37) this Court issued a
9 Minute Order in Chambers Regarding the Requirements of *Klinge v. Eikenberry* and *Rand v.*
10 *Rowland*. The Court's Order 38 provided:

11 IT IS THEREFORE ORDERED that non-moving party or parties shall have 14
12 days, or 21 days for a motion for summary judgment, from the date of this Minute
13 Order within which to file and serve points and authorities (and any other required
14 documents) in opposition to the pending dispositive motion pursuant to the
15 instructions herein, . . . (Order 38, page 3.)

16 Additionally, Fed. R. Civ. P. 16(f) provides: a district court "on motion or on its own, the
17 court may issue any just orders, including those authorized by rule 37(b)(2)(A)(ii)-(vii), if a party
18 or its attorney: . . .

19 (C) fails to obey a scheduling or other pretrial order.
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1 Accordingly, Plaintiff Ms. Feldman requests this Court enter judgment in her favor against
2 each defendant.

3 Respectfully submitted,

4 DATED this 21st day of May 2025.

Machat & Associates, PC

5 By: /s/Michael Machat

6 Michael Machat

7 Appearing *pro hac vice*

8 California State Bar Number 109475

9 8730 W. Sunset Blvd., Suite 250

W. Hollywood, CA 90069

Attorneys for Plaintiff Sonia Feldman

10 *G. MARK ALBRIGHT, ESQ. (1394)*

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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that I am an employee of ALBRIGHT, STODDARD, WARNICK & ALBRIGHT and that on this 21st day of May, 2025, service was made by the following mode/method a true and correct copy of the foregoing **PLAINTIFF SONIA FELDMAN'S NOTICE OF NON-COMPLIANCE WITH COURT'S ORDERS (DKT. 36) AND (DKT. 38)** to the following person(s):

<p>MARK ANTHONY SAWYER dba MAS Financing 6940 N. Jensen Street Las Vegas, NV 89149-1365 Msawyer2729@yahoo.com <i>Defendant</i></p>	<p>XX Certified Mail Electronic Filing/Service XX Email Facsimile Hand Delivery XX Regular Mail</p>
<p>JENNIFER SAWYER 6940 N. Jensen Street Las Vegas, NV 89149-1365 Jen61002@hotmail.com <i>Defendant</i></p>	<p>XX Certified Mail Electronic Filing/Service XX Email Facsimile Hand Delivery XX Regular Mail</p>
<p>MJS NEVADA TRUST 6940 N. Jensen Street Las Vegas, NV 89149 <i>Defendant</i></p>	<p>XX Certified Mail Electronic Filing/Service Email Facsimile Hand Delivery XX Regular Mail</p>
<p>THE PROPERTY LOCATED AT 6508 Setting Moon Street North Las Vegas, NV 89084-1258 <i>Defendant</i></p>	<p>XX Certified Mail Electronic Filing/Service Email Facsimile Hand Delivery XX Regular Mail</p>
<p>ATD COMMERCE, LLC C/O US Corporate Solutions, LLC 2685 S. Rainbow Blvd., Ste. 213 Las Vegas, NV 89146 <i>Defendant</i></p>	<p>XX Certified Mail Electronic Filing/Service Email Facsimile Hand Delivery XX Regular Mail</p>

1 ACM NORTH, LLC
2 C/O US Corporate Solutions, LLC
3 2685 S. Rainbow Blvd., Ste. 213
4 Las Vegas, NV 89146
5 *Defendant*

XX Certified Mail
Electronic Filing/Service
Email
Facsimile
Hand Delivery
XX Regular Mail

5 MAS HOLDINGS GROUP, LLC
6 C/O US Corporate Solutions, LLC
7 2685 S. Rainbow Blvd., Ste. 213
8 Las Vegas, NV 89146
9 *Defendant*

XX Certified Mail
Electronic Filing/Service
Email
Facsimile
Hand Delivery
XX Regular Mail

9 SAWYER HOLDINGS, LLC
10 C/O Jeffrey Burr, LTD
11 2600 Paseo Verde Pkwy., Suite 200
12 Henderson, NV 89074
13 *Defendant*

XX Certified Mail
Electronic Filing/Service
Email
Facsimile
Hand Delivery
XX Regular Mail

14
15 /s/ Michelle Karony

16 An employee of Albright, Stoddard, Warnick &
17 Albright
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